

ERIC L. CRAMER (*pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
ecramer@bm.net

JOSEPH R. SAVERI (*pro hac vice*)
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1000
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com

RICHARD A. KOFFMAN (*pro hac vice*)
COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W.,
Suite 500, East Tower
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408 4699
rkoffman@cohenmilstein.com

*Counsel for the Class and Attorneys for All
Individual and Representative Plaintiffs*

[Additional Counsel Listed on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF JOSEPH R.
SAVERI IN SUPPORT OF PLAINTIFFS'
MOTIONS IN LIMINE NOS. 8 TO 12 TO
EXCLUDE UNSUBSTANTIATED OR
IRRELEVANT EXPERT TESTIMONY**

1 I, Joseph R. Saveri, Esq., declare and state as follows:

2 1. I am the founder of the Joseph Saveri Law Firm, LLP and one of the Court
3 appointed Co-Lead Class Counsel to represent the Bout Class in *Le v. Zuffa, LLC*, No. 2:15-cv-
4 1045 (D. Nev.). I am a member in good standing of the California bar and have been admitted
5 *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts
6 stated in this Declaration. If called as a witness, I could and would testify competently to them. I
7 make this declaration pursuant to 28 U.S.C. § 1746.

8 2. Defendants have proposed filing a trial exhibit tentatively marked as DX-0403, which is a
9 one-page email string bates-stamped ZFL-1001710 between UFC employees regarding the
10 results of a purported drug test from an unidentified source. Plaintiffs have lodged several
11 objections to this document.

12 3. Defendants have proposed filing trial exhibits tentatively marked as DX-0012, DX-0013,
13 DX-0014, and DX-0015, which are email chains including Plaintiff Nathan Quarry dated in 2012
14 regarding an Argentinian MMA promotion. Plaintiffs have lodged several objections to these
15 documents.

16 4. Attached as **Exhibit M** is a true and correct copy of excerpts of the deposition of Plaintiff
17 Nathan Quarry.

18 5. Attached as **Exhibit Y** is a true and correct copy of the response that Defendant Zuffa
19 served to Plaintiffs' Interrogatories, Set Four, No. 15.

20 6. I declare under penalty of perjury and the laws of the United States that the foregoing is
21 true and correct. This Declaration was executed in San Francisco, California on February 29,
22 2024.

23 Dated: February 29, 2024

By: /s/ Joseph R. Saveri

24 Joseph R. Saveri (*admitted pro hac vice*)
25 Kevin E. Rayhill (*admitted pro hac vice*)
26 Christopher K. L. Young (*admitted pro hac vice*)
27 Itak Moradi (*admitted pro hac vice*)
28 JOSEPH SAVERI LAW FIRM, LLP
601 California St., Suite 1000

San Francisco, CA 94108
Telephone: +1 (415) 500-6800
Facsimile: +1 (415) 395-9940
Email: jsaveri@saverilawfirm.com
Email: krayhill@saverilawfirm.com
Email: cyoung@saverilawfirm.com
Email: imoradi@saverilawfirm.com

Eric L. Cramer (*admitted pro hac vice*)
Michael Dell'Angelo (*admitted pro hac vice*)
Patrick F. Madden (*admitted pro hac vice*)
Ellen Noteware (*admitted pro hac vice*)
Najah Jacobs (*admitted pro hac vice*)
BERGER MONTAGUE PC
1818 Market St., Suite 3600
Philadelphia, PA 19103
Telephone: +1 (215) 875-3000
Email: ecramer@bm.net
Email: mdellangelo@bm.net
Email: pmadden@bm.net
Email: enoteware@bm.net
Email: njacobs@bm.net

Joshua P. Davis (*admitted pro hac vice*)
BERGER MONTAGUE PC
505 Montgomery Street, Suite 625
San Francisco, CA 94111
Telephone: +1 (415) 906-0684
Email: jdavis@bm.net
Richard A. Koffman (*pro hac vice*)
Benjamin Brown (*pro hac vice*)
Daniel H. Silverman (*pro hac vice*)

COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W., Suite 500 East, Tower
Washington, DC 20005
Telephone: +1 (202) 408-4600
Facsimile: +1 (202) 408-4699
Email: rkoffman@cohenmilstein.com
Email: bbrown@cohenmilstein.com
Email: dsilverman@cohenmilstein.com

*Co-Lead Counsel for the Class and Attorneys for
Individual and Representative Plaintiffs*

Don Springmeyer (Bar No. 1021)
KEMP JONES, LLP

3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
Telephone: + 1 (702) 385-6000
Facsimile: + 1 (702) 385-6001
Email: dspringmeyer@kempjones.com

*Liaison Counsel for the Class and Attorneys for
Individual and Representative Plaintiffs*

Robert C. Maysey (pro hac vice)
Jerome K. Elwell (pro hac vice)
WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Telephone: +1 (602) 264-7101
Facsimile: +1 (602) 234-0419
Email: rmaysey@warnerangle.com
Email: jelwell@warnerangle.com

Crane Pomerantz (Bar No. 14103)
CLARK HILL PLC
1700 S. Pavilion Center Drive
Suite 500
Las Vegas, NV 89135
Telephone: +1 (702) 697-7545
Email: cpomerantz@clarkhill.com

*Counsel for the Class and Attorneys for Individual
and Representative Plaintiffs.*